IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
FILED
APR 19 2017
MARY C. LOEWENGUTH, CLERK
WESTERN DISTRICT OF NY

UNITED STATES OF AMERICA,

v.

17-CR-17

DAVID MENZIES,

Defendant.

INFORMATION

(Title 26, United States Code, Section 7206(2))

COUNT 1

The United States Attorney Charges That:

On or about April 16, 2012, in the Western District of New York and elsewhere, the defendant, DAVID MENZIES, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of a U.S. Individual Income Tax Return (Form 1040), in the name of Client 1, for the calendar year 2011. The return was false and fraudulent as to a material matter, in that it reported that Dependent A was Client 1's nephew and dependent, whereas, as the defendant then and there knew, Dependent A was not Client 1's nephew, and Client 1 had not cared for Dependent A in 2011. The return was also false and fraudulent as to a material matter, in that it reported that Client 1 earned $15,000 in gross receipts from selling Avon products, whereas, as the defendant then and there knew, Client 1, in reality, never sold Avon products and earned no gross receipts from selling such products.

All in violation of Title 26, United States Code, Section 7206(2).

DATED: Buffalo, New York, April 19, 2017.

JAMES P. KENNEDY, JR.
Acting United States Attorney

BY: [signature]

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